

Exhibit C

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16 Attorneys for all Plaintiffs, individually and on
17 behalf of all those similarly situated

18 **UNITED STATES DISTRICT COURT**

19 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

20 AARON SENNE, et al., Individually and on
21 Behalf of All Those Similarly Situated;

22 Plaintiffs,

23 vs.

24 OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
doing business as MAJOR LEAGUE
25 BASEBALL; et al.;

26 Defendants.

CASE NO. 3:14-cv-00608-JCS

CLASS ACTION

**PLAINTIFFS' FIRST SET OF
INTERROGATORIES TO OFFICE OF
THE COMMISSIONER OF BASEBALL
REGARDING VENUE**

Pursuant to Fed. R. Civ. P. 33, Plaintiffs hereby request Office of the Commissioner of Baseball to respond to the following Interrogatories within thirty (30) days of the date of these Interrogatories:

DEFINITIONS

1. The term “Communication” (or any variant thereof) means any contact between or among two or more Persons, including but not limited to written contact by means such as letters, memoranda, telegrams, telecopies, telexes, e-mail, instant message, or any other Document; the transmittal of information by any means; any oral contact such as face-to-face meetings or telephone conversations; and any writings memorializing such oral contact.

2. The term “Document” or “Documents” means “any designated documents or electronically stored information—including writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations—stored in any medium from which information can be obtained either directly or, if necessary, after translation by the responding party into a reasonably usable form. Fed. R. Civ. P. 34(a)(1)(A).

3. The term “Identify” with respect to a natural person, shall require You to state the Person’s name, residential address, business addresses, title and scope of duties, if applicable.

4. The term “Identify” with respect to corporation, firm, company, sole proprietorship, partnership, joint venture, association, institute, or other business, legal or governmental entity or association shall require you to state its, state of incorporation, the address it maintains for its principal place of business, headquarters, and each of its offices.

5. The term “Person” means natural person, corporation, firm, company, sole proprietorship, partnership, joint venture, association, institute, or other business, legal or governmental entity or association, including any directors, officers, employees, agents, successors, predecessors, assignees, or representatives thereof.

6. As used herein “You” or “Your” means Office of the Commissioner of Baseball, including its agents, subsidiaries, related entities, affiliated companies, predecessors, successors, assigns, officers, directors, partners, employees, representatives (in their individual or representative capacities), affiliates of any kind or nature, or any person or entity acting on its behalf.

7. Unless otherwise specified herein, the terms and phrases used in these Interrogatories shall have the same meaning as applied to them when used in the Basic Agreement of the Major League Players Association or the Major League Rules, as applicable, or their commonsense, dictionary meaning. If You contend that a term or phrase is vague or ambiguous You shall answer the Interrogatory based on Your interpretation of the term or phrase and provide an description of Your understanding.

INSTRUCTIONS

1. To the fullest extent, each Interrogatory shall be deemed continuing so as to require further and supplemental responses if You receive, discover, become aware of or create additional responsive information subsequent to the date of Your response to these Interrogatories.

2. If You object to or otherwise refuse to comply with any portion of an Interrogatory, please (i) state the objection or reason for such refusal, and (ii) provide all information called for by that portion of the Interrogatory to which You do not object or which You do not decline to answer as follows:

a. If You object to a Interrogatory on the ground that to respond would constitute an undue burden, then You shall respond as fully as possible without undertaking such asserted undue burden; and

b. If You object to any portion of an Interrogatory on the ground that it is vague or indefinite, You shall set forth Your good faith understanding of the allegedly vague or indefinite term and shall then respond to the Interrogatory based upon that stated understanding.

3. If You refuse to answer any Interrogatory on the ground of privilege, please provide a statement of the claim of privilege and all facts relied upon in support of that claim. Fed. R. Civ. P. 26(b)(5).

4. Unless otherwise stated, the time period for each interrogatory is January 1, 2008 through the present.

INTERROGATORIES

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2 1. Identify each Person (including but not limited to executives, scouts, or any other
3 employees) employed or contracted by You who has any responsibility for minor league operations
4 and has (i) lived in California, (ii) worked in California, (iii) made a business trip to California, or (iv)
5 recruited any baseball player living in California or attending High School, College or Junior College in
6 California.

7 2. For each Person Identified in Interrogatory number 2(i), state:

- 8 a. The Person's city of residence;
9 b. The city in which the Person has maintained his place of business; and
10 c. The Person's title and scope of responsibility.

11 3. For each Person Identified in response to Interrogatory number 2(ii)-(iv), state:

- 12 a. The Person's city of residence;
13 b. The city in which the Person has maintained his place of business;
14 c. The purpose and duration of the Person's presence in California for each occasion he
15 or she was in California; and
16 d. The Person's title and scope of responsibility.

17 4. Identify each possible witness who you contend will be inconvenienced by a trial of
18 this case in the Northern District of California, the reason each will be inconvenienced, and the
19 Person's city of residence and address at which the Person maintains his place of business.

20 5. Identify any revenue You have generated based on any activity occurring in California,
21 whether the activity was performed by You or not, including revenue from licensing, merchandising,
22 televised baseball games, ticket sales, the Base Plan (Article XXIV of the Basic Agreement), the
23 Revenue Sharing Plan (Article XXIV of the Basic Agreement), the Supplemental Plan (Article XXIV
24 of the Basic Agreement), the Commissioner's Discretionary Fund (Article XXIV of the Basic
25 Agreement), Major League Baseball Properties, Inc., or Major League Baseball Advanced Media, and
26 state:

- 27 a. The amount of the revenue by Revenue Sharing Year or calendar year ;
28 b. The source of the revenue by Revenue Sharing Year or calendar year.

1 6. Identify each of Your employees for whom You have paid payroll taxes to the state of
2 California due to work performed on Your behalf.

3 7. Have You ever been qualified, licensed or registered to do business in California? If
4 yes, identify the years in which You were registered to do business in California and the reason You
5 terminated the registration or otherwise failed to continue to be registered to do business in
6 California.

7 8. Identify each first year player that You permitted to alter or change his Uniform Player
8 Contract, identify each term of the contract (other than information provided in the addenda, such as
9 the personal information of the draftee, the signing bonus, if any, and college scholarship plan, if any).

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Dated: July 9, 2014

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/s/ Giuseppe S. Giardina

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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of July, 2014, a true and accurate copy of the foregoing was served via electronic mail on the following:

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